

Multi-Media Inspection

Joseph Smith & Sons, Inc.
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Beaver Heights, Md. 20743

(mailing address)
P.O. Box 64430
Washington, D.C. 20029-4430

General Auto Parts
1919 Kenilworth Avenue
Beaver Heights, Md. 20743

Date of Inspection: May 10 & 11, 1994

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Facility Representatives:

Ed Johnson
Vice President &
General Manager

Paul Smith
President

John McCarvey
General Manager
General Auto Parts

Background

As part of EPA Region III's Chesapeake Bay Program's Environmental Equity efforts in the District of Columbia, the Annapolis Operations Section was asked to conduct a multi-media screening inspection at Joseph Smith & Sons, Inc. The inspection was conducted on December 17, 1992 and the inspection results were forwarded to the Chesapeake Bay Program office in Region III, Philadelphia.

Based on the inspection findings and some discussion with the State of Maryland's Department of the Environment, the case was referred to Region III's enforcement branch chiefs as a potential site for a multi-media enforcement project.

A decision was made to move ahead with the case to include Joseph Smith & Sons and also a second facility (General Auto Parts) which is owned by Mr. Paul Smith (President, Joseph Smith & Sons).

Initially, request for information letters were drafted and sent (November 9, 1993) to both Joseph Smith & Sons and General Auto Parts. These letters contained requests for a variety of information regarding the facility, including information about hazardous waste materials, CFCs, Underground Injection Wells, wastewater and wastewater treatment units. The responses from both Joseph Smith and General Auto Parts were reviewed by EPA and the State of Maryland.

Based on the facilities' response to the information request letters and a number of other factors, it was decided that a joint (EPA & MDE) multi-media inspection would be conducted at both Joseph Smith & Sons and General Auto Parts. The initial request for an inspection was forwarded to EPA Region III's Annapolis Operations Section (AOS). A representative from AOS (Gerard Crutchley) was assigned as the team leader for the inspection.

The inspection itself was to be conducted by both the EPA and the Maryland Department of the Environment. The inspection was to include a review of the procedures in place at both facilities with regards to storm water management, underground storage tanks, underground injection wells, PCBs and CFCs. Representatives from Region III's Superfund program were also present during the inspection to collect samples from different locations throughout both facilities as well as from a small creek (Beaver Dam Creek) which is the physical boundary between both of the facilities.

The EPA team leader notified both facilities of the impending inspection on May 9, 1994 and the actual inspection was conducted on May 10 & 11, 1994.

Inspection Observations

On May 10, 1994, the EPA and MDE representatives arrived at

Joseph Smith & Sons, Inc. and met with Mr. Paul Smith (President), Mr. Ed Johnson (Vice President & Operations Manager) and other facility personnel. The EPA team leader (Gerard Crutchley) conducted a brief opening conference in which he explained how the inspections were to be conducted and which specific areas or processes were of interest to the inspection team. All of the personnel in attendance at the opening conference are listed in a attached document (See Attachment No. 1).

Following the opening conference, the EPA Superfund personnel along with a facility contractor began their sampling of the various locations in Beaver Dam Creek as well as the Joseph Smith and General Auto parts sites. The remaining EPA and MDE representatives, accompanied by facility personnel, began a general tour of the Joseph Smith site. The following observations were noted by Gerard Crutchley and other EPA personnel during the tour:

The facility processes have not changed since the EPA Multi-Media Screening Inspection conducted in December, 1992 with the exception of the shearing operation. At the time of the subject inspection, the shearing operation was not operating and, according to facility personnel, had been out of operation since the Fall of 1993. Mr. Ed Johnson stated that the facility has plans to restart this operation after it has been overhauled.

As the inspection team toured the subject facility, they observed various portions of the facility's shredder operation. The shredder itself is a 3,000 h.p. wet process shredding unit (See Photo Nos. 2, 6, 8, 55, 56, & 57). The inspection team also observed piles of material which would be processed through the shredder unit (See Photo Nos. 1 & 14). A more detailed description of the shredder operation is included in the December, 1992 EPA Multi-Media Inspection report (See Attachment No. 2). The only change to the description provided in Attachment No. 2 is that the materials described as being processed through the shredder are segregated into two types (junk automobiles/metal scrap and construction debris). The junk automobiles/metal scrap generates "auto fluff" which is used as a daily cover material at landfills. The construction debris generates a material known as "Recover Mat", which is also used as a daily cover material at landfills. According to facility personnel, the two types of materials (junk automobiles/metal scrap and construction debris) are never processed together.

The inspection team observed an excavated pit located southeast of the shredder operation and adjacent to Beaver Dam Creek (See Photo No. 3, 60 & 61).

This pit is identified on the attached site plan (See Attachment No. 3) as a dry well and is described as an unlined earthen excavation for the collection of subsurface water which is to be used in the facility's shredder operation (See Item No. 1, Attachment No. 4). According to facility personnel, if the water in the pit reaches a certain level, it will migrate through the

soil and eventually runoff into Beaver Dam Creek. The inspection team members did observe an area of stained soil on the bank of the creek adjacent to the excavated pit (See Photo No. 4 & 63).

Adjacent to the pit is a large pile of scrap (See Photo No. 5 & 60). According to a consent order issued to the facility in July of 1987 by the State of Maryland, this pile of scrap was to be moved away from the bank of the creek to prevent any automobile parts or scrap from entering Beaver Dam Creek. The removal of this pile of scrap and some larger piles of fluff from the northeast side of the facility are the only two items from the consent order which remain to be accomplished.

In several areas of the facility, pooled water was observed by the inspection team, mainly in the areas of the facility containing the shredder unit and all of the materials associated with the shredding operation. Most of these areas of pooled water appeared to have an oily sheen on the surface (See Photo No. 9, 68 & 74).

A large basin is located on the north side of the facility adjacent to the railroad tracks (See Attachment No. 3 & Photo No. 10, 69, 70 & 72). This basin is identified by the facility as a storm water retention basin (an unlined, earthen excavation) for the collection of storm water, which may be pumped to the shredding operation for use in the process. At the north end of the basin, the EPA inspector (Gerard Crutchley) observed an area where it appears that water from the basin has overflowed from the basin onto the soil adjacent to the railroad tracks (See Photo Nos. 11, 12 & 71).

In this same area, the EPA inspector also observed what appeared to be leachate flowing from the bottom of a pile of "Recover-Mat" material onto the soil adjacent to the railroad tracks (See Photo No. 13 & 73).

As the inspection team toured the area of the facility where the shearing operation is located (See Photo No. 65), the EPA inspector observed a number of old metal gas cylinders piled next to the building housing the shearing operation machinery (See Photo No. 30).

After touring the area of the facility associated with the shredding and shearing operations, the inspection team toured the facility's maintenance shop. The maintenance shop is located in a portion of the building housing part of the non ferrous metal operation and the facility's offices. This shop performs all types of general maintenance and repair on the facility's vehicles as well as all of the machinery associated with shredding and shearing processes including cranes and bulldozers.

While touring this area, the inspection team observed a number of drums (55 gallon capacity) containing various materials such as lubricating oils, anti-freeze and transmission fluid (See Photo No. 16). The inspection team also observed a small tank located in the

corner of the maintenance shop which, according to facility personnel, was used for the collection of used oils removed from facility equipment (See Photo No. 15).

So what!!! Where are your tracking samples?

The EPA inspector (Gerard Crutchley) questioned facility personnel regarding the use of any solvents in their maintenance activities. Mr. Ed Johnson stated that the facility did use some solvents in the past but has since stopped using solvents and switched to using a less toxic type of cleaner in the maintenance shop. The EPA inspector then observed a fifty five gallon drum which was marked with the words Duralene "Rizol Solvent". The drum was lying on its side in a metal cradle and a small bung had been removed and replaced with a drain spout. A metal pan, located on the floor under the drain spout, contained a small amount of liquid (See Photo No. 16). The EPA inspector again asked facility personnel about the use of solvents in the shop and again the facility personnel stated that they no longer use solvents. The EPA inspector asked facility personnel several times about the drum of solvent in the metal cradle and each time the facility personnel had no explanation for the drum or why it was in the shop.

Mr. Johnson did say that he thought the drum was going to be removed from the site, but had no explanation for why it appeared as though it was being used. Mr. Johnson did provide copies of the MSDS sheets to the EPA inspector for both the Duralene "Rizol Solvent" and the cleaner (Citra Clean) which the facility now uses in their maintenance shop (See Attachment Nos. 5 & 6).

Yeah is a tool act. The! So no come didn't note

Located outside of the building housing the maintenance shop is an area which is part of the non-ferrous metals operation. While touring this area, the inspection team observed approximately twenty three wooden pallets containing car batteries (See Photo No. 20). According to Mr. Johnson, junk automobiles coming into the facility for processing are not accepted if they contain batteries. If a junk automobile does contain a battery, the customer is required to remove it before the automobile will be accepted for processing. Mr. Johnson said that they will purchase these batteries from the customer to avoid having the customers dump the batteries on the roadway just outside of the facility. Mr. Johnson also said that approximately once per month they ship all of these batteries off site to a recycling facility. Usually the batteries are sent to X-ide in Reading, Pennsylvania or to RSR located in Dallas, Texas. The EPA inspection team also observed a number of large industrial batteries stored in this same area (See Photo Nos. 19 & 21).

A large pile of scrap electronic equipment which appeared to be military type was observed adjacent to the building in the same area as the batteries (See Photo Nos. 18 & 19). The EPA inspector (Gerard Crutchley) could not determine if any of this scrap equipment contained small capacitors which may contain PCBs.

The non-ferrous metals operation consists of purchasing scrap metal (mainly aluminum and stainless steel), sorting the metals by type,

shearing the metal and then shipping the metal off-site for recycling. The EPA inspector (Gerard Crutchley) did not observe any waste materials being generated by this process.

Located northwest of the facility's main building, is a concrete plant which is on Joseph Smith's property. At the time of the subject inspection, the concrete plant was not in operation. As the inspection team toured this area of the facility, the EPA inspector (Gerard Crutchley) observed several items. A fifty-five gallon metal drum was observed just outside of a small building adjacent to the concrete plant (See Photo No. 22). The drum was marked with a label which read "Texaco URSA, SP30, 2112". The drum appeared to be full and the EPA inspector did not observe any leaks on or around the drum. The EPA inspector also observed six plastic tanks (approximately four to five hundred gallon capacity) inside of the small building adjacent to the concrete plant. The tanks were all marked with labels indicating that they had been used to contain various mixtures which were added to concrete (e.g. water reducing mixture, plasticizer, etc.). The EPA inspector could not determine if the tanks contained any of these mixtures at the time of the inspection.

Mr. Johnson stated that the concrete plant is owned by Joseph Smith & Sons and that for a period of time the plant was leased to another company who operated the plant and made concrete. Mr. Johnson said that as far as he knows the materials observed by the EPA inspector were left there by the previous operator.

The EPA inspector also observed an oil-filled transformer outside of the concrete plant (See Photo No. 44). There were no labels on the transformer and the EPA inspector did not observe any leaks on or around the transformer. Mr. Johnson stated that he was not even aware that a transformer was located next to the concrete plant. According to Paul Smith, he thought that the transformer located at the concrete plant is owned by PEPCO.

The facility does own two oil-filled transformers. These transformers are located in an outdoor substation which is indicated on the attached site plan (See Attachment No. 3). The substation consists of a fenced area containing two oil filled transformers (See Photo Nos. 24 & 25). The nameplates on both transformers indicate that they were filled with oil. The following information was recorded from the nameplates on the transformers:

Allis Chalmers
Serial No: 4 763 464
Oil ACUS, 767 gallons, 5,755 lbs.

Allis Chalmers
Serial No: 4 763 465
Oil ACUS, 599 gallons, 4500 lbs.

The transformers were not marked with any labels and no leaks

were observed on or around the transformers.

At the completion of the general tour of the Joseph Smith site, the inspection team broke up into smaller groups to either tour General Auto Parts or to investigate in more detail those areas at Joseph Smith or General Auto Parts which were of specific interest to the inspection team members.

The EPA inspector (Gerard Crutchley) met with Mr. Ed Johnson to discuss the procedures in place at both Joseph Smith and General Auto Parts to deal with storm water management, underground storage tanks and PCBs. Marie Holman (EPA, Water Division) toured General Auto Parts to determine if any underground injection wells were located at the site and Humberto Monsalvo (EPA, Air Division) toured General Auto Parts and talked with facility personnel regarding the facilities (Joseph Smith and General Auto Parts) procedures for controlling the release of CFCs.

The information obtained from facility personnel regarding each of the aforementioned programs is as follows:

Storm Water Management

Joseph Smith & Sons was originally included under a group storm water permit application filed by the Institute of Scrap Recycling Industries, Inc. (ISRI). According to Mr. Johnson, ISRI is still actively involved in working with EPA to process the permit application and according to a memorandum (dated 9-13-93) from ISRI to all of its group members is awaiting the issuance of a model permit for the group before October 1, 1993 (See Attachment No. 7). However, it also states in the memorandum that it appears that EPA will not issue any group permits by the October 1, 1993 deadline set by EPA; and therefore, ISRI recommended to all of its group members that they should consider filing for coverage under a state general permit by October 1, 1993.

In response to this recommendation, Joseph Smith & Sons filed a Notice of Intent for coverage under a general permit with the State of Maryland on 9-27-93 (See Attachment No. 8). The State of Maryland conducted an inspection of the facility on October 12, 1993 (See Attachment No. 9) and the facility was issued a general permit (No. 92-GP-0001) on 4-13-94 (See Attachment No. 10).

One condition of the general permit is that the facility prepare and submit to the State of Maryland a Storm Water Pollution Prevention Plan. Mr. Johnson stated that the facility hired a contractor and that the contractor was currently working on preparing the plan and they hoped to complete the plan and submit to the state by October of 1994.

Mr. Johnson also stated that upon receipt of the general permit issued by the State of Maryland, the facility personnel decided that they wanted to withdraw their application for an

individual permit and remain a part of the group permit application. The facility mailed a letter to the State of Maryland on April 27, 1994 expressing their concerns (See Attachment No. 11). On May 11, 1994, Ed Johnson spoke with Ed Gertler (Chief, Industrial Permits Division, State of Maryland) regarding the April 27th letter and according to Mr. Johnson, Mr. Gertler said that the State of Maryland wants the facility to withdraw from the group permit application and remain with the application for an individual permit. Mr. Johnson also said that their original intent was to include both Joseph Smith & Sons and General Auto Parts under the same permit, however, the State of Maryland wants facility personnel to submit a separate application for a storm water permit for General Auto Parts.

Mr. Johnson stated that Joseph Smith & Sons intends to have most of the storm water runoff directed into the storm water retention basin. The water would collect in the basin and eventually be pumped over to the shredder operation for use in the shredding process. Mr. Johnson also said that there will be some storm water runoff from the site, specifically from the northeast side of the facility and from the area west of the non-ferrous operation.

On the General Auto Parts side of Beaver Dam Creek, the facility personnel have placed a line of concrete barriers and a line of hay bales to try and control runoff from the General Auto Parts site into Beaver Dam Creek (See Photo No. 48). However, it was noted that there is obviously some runoff from the site into Beaver Dam Creek as indicated by stained soil running down the bank of the creek (See Photo No. 27) and by a breach in the line of hay bales (See Photo No. 49). Mr. Johnson did say that there is some storm water runoff from General Auto Parts into the street (storm drains) on the south side of the property.

Underground Storage Tanks

Up until January of 1994, there was one underground storage tank on the Joseph Smith site and two underground storage tanks on the General Auto Parts site.

The tank at the Joseph Smith site was an 8,000 gallon tank that was used to store diesel fuel for the facility's equipment. Mr. Johnson stated that there were no records available regarding the use of the tank with the exception of fuel purchase records. Mr. Johnson also said that as far he knows, there were no leak detection procedures in place while the tank was in use at the facility. The tank was a single walled metal tank and it did not have any cathodic protection. Facility personnel estimated that the tank was approximately twenty years old. On January 11, 1994, the tank was removed from the Joseph Smith site (See Attachment No. 12) and replaced by a new above ground storage tank (5,000 gallon capacity). At the time of the removal, a representative from the Maryland Department of the Environment was at the site to observe

the removal of the tank and to determine if any fuel had leaked from the tank into the surrounding soil. According to a copy of a state inspection report, the tank had no visible perforations and the state inspector gave the facility permission to backfill the excavation with clean soil (See Attachment No. 13). The State of Maryland had previously inspected the tank at Joseph Smith in June of 1993, however, information regarding the tank obtained by the inspector at that time was incorrect as indicated by the attached inspection report (See Attachment No. 14).

According to Mr. Ed Johnson, the two underground tanks located on the General Auto Parts site were originally on property which was owned by a truck distribution center (See Attachment No. 15 & Photo No. 36). Mr. Johnson said that the tanks were probably used to store fuel for the trucks. After Paul Smith purchased the property in 1990/1991, these two tanks were then used to store waste gasoline removed from the junk cars coming into the facility (General Auto Parts). There were no records available regarding the tanks and no indication that facility personnel ever utilized any leak detection procedures while the tanks were in use by General Auto Parts. Both tanks were single-walled steel tanks and neither of the tanks had any type of cathodic protection. The tanks were estimated to be approximately twenty years old, one having a capacity of 4,000 gallons and the other 3,000 gallons. On January 11, 1994, both tanks were removed from the General Auto Parts site. At the time of the removal, a representative from the Maryland Department of the Environment was at the site to observe the removal of the two tanks and to determine if any fuel had leaked from the tanks. According to a state inspection report (See Attachment No. 16), water and fuel was visible in the soil at the time of the tank removal and the state inspector issued a site complaint to the facility (See Attachment No 17). The site complaint required the removal of the water and fuel as well as contaminated soil and the installation of one monitoring well. On February 22, 1994, the state inspector met with facility personnel to discuss the installation of the monitoring well. According to the attached inspection report (See Attachment No. 18), the well was to be installed on February 23, 1994 (See Photo No. 37) and the first round of sampling was to be conducted fourteen days after the installation of the well. At the time of the subject inspection, Mr. Johnson said that they had not yet collected samples from the well because the state inspector said that he wanted to be present during the first round of sampling and he has not been able to schedule a visit to the facility for this purpose. Both the tanks removed from General Auto Parts and the tank removed from Joseph Smith were taken to Joseph Smith to cut up for scrap.

PCBs

Joseph Smith & Sons owns two oil-filled transformers. Both transformers are located in an outdoor substation at the site. Mr. Johnson said the oil from both transformers had been sampled and tested for PCB content in October of 1992. Based on the test

results (< 50 PPM) it was determined that both transformers were non PCB (See Attachment No. 19).

As previously stated, the EPA inspector did observe one other oil-filled transformer on site. This transformer was located adjacent to the concrete plant. Mr. Paul Smith stated that as far as he knew, this transformer was owned by PEPCO.

Mr. Johnson said that as far he knows there are no large oil-filled capacitors in use at the site and the EPA inspector did not observe any capacitors at the site.

The facility does have several hydraulic systems which are associated with the shredding and shearing operations. There are three separate hydraulic systems on the shredding unit, however, Mr. Johnson said two of these units were new units installed within the last two years and the other is a new unit which was installed within the last four years. There is also a hydraulic system on the shearing unit which is a used unit that was installed approximately five to six years ago. However, Mr. Johnson said that this unit was completely rebuilt at the time it was installed. The facility personnel said that they have no reason to believe that their hydraulic systems ever contained PCBs.

The facility also owns electromagnets but, all of these are dry type units that do not contain any oil.

The State of Maryland requires the facility to sample and analyze the shredder fluff generated by their shredding operation for PCB content once per month (See Attachment No. 20). This analysis is required along with TPH and TCLP (metals) analysis for materials which are used as daily landfill cover materials. During the subject inspection, the EPA inspector reviewed some of the facility's analytical data for PCB analysis of the fluff material (1991 - 1994). These results did not indicate the presence of PCBs at concentrations above 50 PPM (See Attachment No. 21).

At the time of the subject inspection, the EPA inspector (Gerard Crutchley) collected samples from several locations at the facility for PCB analysis. Specifically, samples were collected from the following locations (1) a pile of shredder fluff, approximately 50 feet east of the shredder unit process water holding tank, (2) a pile of shredder fluff, approximately 100 feet west of the railroad bridge and (3) a pile of "Recover Mat" material approximately 300 feet east of the maintenance garage. At each sample location, the EPA inspector sampled material from five points along the perimeter of the piles and composited these materials together to form one sample from each pile. All three of the samples remained in the custody of the EPA inspector until they were delivered to the Delaware Department of Natural Resources and Environmental Control's laboratory in Dover, Delaware for analysis. The analytical results from all three samples are included as an attachment to this report (See Attachment No. 22) and are listed below for your information.

<u>Sample No.</u>	<u>Sample Location</u>	<u>Analytical Results</u>
JSS-1	Pile of shredder fluff approximately 50' east of shredder unit process water holding tank (Photo Nos. 38 & 39)	87 mg/kg
JSS-2	Pile of shredder fluff (D-6) approximately 100' west of railroad bridge (Photo Nos. 40 & 41)	26.4 mg/kg
JSS-3	Pile of "Recover Mat" material approximately 300' east of the maintenance garage (Photo Nos. 42 & 43)	26 mg/kg

Underground Injection Control

During the subject inspection, an evaluation was made by Marie Holman of EPA Region III's UIC Section to determine if either facility (Joseph Smith or General Auto Parts) had any wells or other means of conveyance (e.g., dry wells, septic tanks, dug pits, drain fields, etc.) which could be classified as underground injection wells.

UIC Inspection Observations

Dry Well (identified on Attachment No. 3)

During the subject inspection, Marie Holman observed this dry well (See Photo No. 3, 60 & 61), which was an excavated hole adjacent to a pile of scrap iron. There were also a number of rubber tires mixed in with the pile of scrap iron (See Photo Nos. 3, 5 & 60).

The hole was approximately eight feet (8') wide. It was filled with a very black* liquid (see photos); no sheen was noted.

Mr. Johnson told Marie Holman that they dug the hole to control surface runoff to the creek. Apparently, there was a pipe (See Photo No. 62) from the scrap metal pile that went over to the creek (direct discharge). Mr. Johnson said that someone from the State told him to disconnect the pipe and recommended a dry well to control surface runoff to the creek.

Marie Holman told Mr. Johnson that this dry well is classified as a Class V UIC well and could potentially be a Class IV well, which are banned. The EPA contractor (on site at the time of the inspection) sampled the liquid and the sediment in the dry well.

Mr. Johnson told the EPA inspector (Marie Holman) that when the hole fills up, the facility personnel pump the water over to the wet shredding process area. Mr. Johnson indicated that the area from the shredder to a few feet before the dry well was all concrete. Ms. Holman did not observe any concrete in this area; it appeared to be black* soil.

Drain near office area/weighing area

According to facility personnel, this drain was just recently installed. The size of the drain is approximately 4 feet long by one and one half feet wide by five feet deep. The facility personnel use this area to wash their heavy equipment (trucks, bulldozers, etc.). The facility personnel said that the drain and surrounding pad were constructed of concrete, however, since the drain was approximately three quarters full at the time of the inspection, the EPA inspectors could not determine if the drain had a concrete bottom. The drain should not discharge to the subsurface (e.g., have an earthen bottom or discharge to a septic system). Facility personnel also indicated that when the drain fills up, it is pumped out; However, the facility personnel could not tell the EPA inspector where they pump the wastewater. The EPA inspector (Marie Holman) also noticed above ground fuel tanks very close to the drain on a concrete pad (approx. 15 feet away from the drain). The facility personnel need to identify what happens to the wastewater in the drain.

The EPA inspector also observed a second drain located near the entrance to the maintenance shop. This drain is similar in construction to the one mentioned above and, according to facility personnel, it is used for the same purpose.

Storm water Retention Pond

Marie Holman observed the facilities' storm water retention pond which is not lined and there is no concrete under the pond. It appeared to be a waste disposal lagoon. A pile of "Recover Mat" material is on one side of the pond and a scrap metal pile is on the other side of the pond. Both piles are approximately 25 feet high.

General Auto Parts

When cars come into General Auto Parts, facility personnel drain the gasoline tanks into an open tank (See Photo Nos. 31 & 75). The tank had a rag stuffed into a pipe (a car muffler) which was dripping into a five gallon pail. The gas tank sits on a concrete pad with a berm. The pad has a drainage area in the corner. This round drain was filled with black* liquid (See Photo Nos. 32 & 76.)

There is another concrete pad where facility personnel disassemble the engines from the cars. This pad appears to be too small for this activity (See Photo No. 77).

The EPA inspector (Marie Holman) observed another area where buses were repaired. There are concrete ramps for servicing vehicles, however, a pit under the ramp was earthen. At the time of the inspection, this area had metal grates over the ramps. Facility personnel lay the engines on top of the grates and have placed hay (straw) in the pit area (See Photo No. 78).

*Black soil or liquid: appeared to be either oil or leachate.

Additional Observations

On May 11, 1994, Gerard Crutchley returned to the site to conduct a general tour and inspection of General Auto Parts as well as to continue discussions with facility personnel regarding both facilities (Joseph Smith & General Auto Parts).

According to Mr. Johnson, Mr. Paul Smith purchased the stock of General Auto Parts approximately three and one half years prior to the inspection. Prior to the purchase, the facility now known as General Auto parts was actually four different facilities (General Auto Parts, Import Auto Wreckers, George Underwood, and a fourth facility which Mr. Johnson could not remember the name of at the time of the inspection). After Mr. Smith purchased the property, all four facilities were consolidated into one operation (General Auto Parts).

The EPA inspector (Gerard Crutchley) met with Mr. John McCarvey who is responsible for the daily operations at General Auto Parts. According to Mr. McCarvey, General Auto Parts buys junk automobiles and strips them for usable parts. At the time of the subject inspection, Mr. McCarvey said that they were purchasing approximately fifty vehicles per day.

According to Mr. McCarvey, cars coming into the facility are initially checked to determine if they contain any usable parts and if not, they are sent directly into the Joseph Smith site. The cars brought into General Auto Parts are first weighed (See Photo No. 45) and then placed in a holding area where a determination is made as to what parts on the car are of value and what parts are junk. Cars with intact gasoline tanks are lifted with a forklift and dropped onto a metal tank with a manganese spike protruding from the top to puncture the gas tanks and allow any fuel to drain into the metal tank (See Photo Nos. 31 & 75). The capacity of this tank is approximately 250 gallons. An old car muffler is attached to a drain hole at the bottom of the tank and the EPA inspector observed a rag stuffed into the end of the muffler. A five-gallon plastic bucket was placed under the drain to catch fuel which was dripping from the rag. The tank was sitting on a concrete pad with a berm. At one end of the pad is a round sump (See Photo Nos. 32 & 76). According to facility personnel, the sump is made of

concrete with part of a metal drum as a liner. The sump was filled with a black liquid. According to Mr. McCarvey, the fuel accumulation tank (Photo No. 31) reaches capacity approximately once per week. When the tank is filled, the contents are emptied into a larger metal tank with a capacity of approximately 2,000 gallons (See Photo Nos. 33 & 35). When this tank nears capacity, the waste fuel is transported off site for reprocessing. Mr. McCarvey said that this waste fuel is usually picked up by a facility located in Richmond, Va.

There are no set procedures in place at General Auto parts to remove other fluids (anti-freeze & oil) from the junk cars. Mr. McCarvey said that some of these fluids are collected, some remain in the cars and some are spilled on the ground.

Batteries are removed from the vehicles and they are tested to determine if they can be reused. The batteries which are no longer useable are placed on wooden pallets and moved to the Joseph Smith site to be transported off site for recycling.

While touring the subject facility, the EPA inspector (Gerard Crutchley) observed a number of smaller tanks adjacent to the larger gasoline accumulation tank (See Photo No. 35). At the time of the subject inspection, these smaller tanks were all empty. The EPA inspector also observed a tank trailer parked near the end of a storage building at the east end of the property (See Photo No. 83). According to Mr. McCarvey, the tank trailer contained approximately 2,000 gallons of gasoline and the facility was awaiting analysis of the fuel prior to shipping it off site.

Summary of Findings

On May 10 and 11, 1994, representatives from the Environmental Protection Agency and the Maryland Department of the Environment conducted a Multi-Media Inspection at Joseph Smith & Sons and General Auto Parts. Both facilities are located along opposite sides of a tributary (Beaver Dam Creek) of the Anacostia River in Beaver Heights, Maryland. The areas of concern addressed during the inspection included storm water management, underground storage tanks, PCBs, CFCs and underground injection wells. Representatives (contractors) from EPA's Superfund Program were also on site at the time of the inspection to collect samples from a number of locations throughout both facilities as well as from a small creek (Beaver Dam Creek) which is the physical boundary between both of the facilities. The following information provides a brief summarization of the inspection findings:

Storm Water Management

- The Joseph Smith & Sons site is currently regulated under a general storm water discharge permit issued by the State of Maryland on April 14, 1994. The facility had originally filed for a permit under a group storm water permit application, however, the State of Maryland wants the facility to withdraw from the group application and file for an individual permit.
- During the subject inspection, the facility personnel indicated that most of the storm water is directed towards a storm water retention basin located at the site. However, this basin is an unlined basin and during the inspection, the EPA and state personnel observed runoff from this basin onto the adjacent property.
- General Auto Parts is not currently regulated under any form of a storm water permit. Facility personnel had originally intended to include General Auto Parts as part of the Joseph Smith & Sons permit application. However, the State of Maryland wants General Auto Parts to submit a separate application for a storm water permit.
- During the subject inspection, EPA personnel observed that there is obviously some runoff from the General Auto Parts site into Beaver Dam Creek as indicated by stained soil running down the bank into the creek. Facility personnel also indicated that there is some runoff from General Auto Parts onto the street on the south side of the property.

Underground Storage Tanks

- Joseph Smith & Sons had an 8,000 gallon underground storage tank in use at the facility until it was removed in January, 1994. During the period that the tank was in use, facility personnel had not implemented any form of leak detection for

the tank and there were no records available to indicate that a tank tightness test had ever been conducted on the tank or the associated piping.

- General Auto Parts had two underground storage tanks until they were removed in January, 1994. According to facility personnel, the tanks had been used to store waste gasoline removed from junk cars coming into the facility. There were no records to indicate that the facility had ever implemented any form of leak detection for the tanks or if any tank tightness tests had ever been conducted on the tanks. One of these tanks was found to have leaked at the time of removal from the site.

Underground Injection Control

- During the subject inspection, EPA personnel identified a Class V UIC well (dry well) on the Joseph Smith site. Joseph Smith & Sons will need to remediate the dry well. Remove liquid and contaminated soil and if hazardous, dispose of them according to RCRA regulations and backfill with clean soil.
- During the subject inspection, EPA personnel observed two concrete washdown areas at the Joseph Smith site. Facility personnel need to provide additional information regarding these two areas. Specifically, construction information, location of discharge points (ground/surface water) and if they are closed systems, how often are they pumped out and an explanation of the disposal procedures.
- During the subject inspection, EPA personnel observed a service ramp pit area at the General Auto Parts site that is used to store car engines removed from junk cars. The engines are stored on metal grates across the ramps. Facility personnel need to collect samples from this pit area and determine if it is hazardous waste (TCLP). If it fails TCLP, the facility will need to remediate the area by removing contaminated soil and disposing of it properly.
- During the subject inspection, EPA personnel observed a sump in a concrete pad at the General Auto Parts site. The pad is where gasoline is removed from the junk cars coming into General Auto Parts. Facility personnel need to provide additional information regarding this sump including construction information, location of any discharge (ground/surface water) from the sump and if it is a closed system, how often is it pumped out and where is the material disposed of.

PCBs

- During the subject inspection, EPA personnel observed two oil-filled transformers which are owned by Joseph Smith & Sons. Facility personnel provided the EPA inspector with analytical results which indicated that both transformers contain less than 50 PPM PCBs.
- A third transformer was observed at the Joseph Smith site, however facility personnel indicated that the transformer was owned by PEPCO.
- During the subject inspection, samples collected by EPA from a pile of shredder fluff indicated that the pile contained PCBs in excess of 50 PPM (87 mg/kg).
- The EPA inspectors did not identify any PCB issues at the General Auto Parts site.

CFCs

- Procedures regarding CFCs at both Joseph Smith and General Auto Parts will be discussed in a report under a separate cover

Media

____ NPDES
____ TSCA
____ RCRA
____ AIR
____ ☒ Other

FY 89 REGION III ESD
INSPECTION TRACKING SYSTEM

Facility Name: JOSEPH SMITH & SONS Type of Inspection: MULTI-MEDIA
(GENERAL)

Address: 2001 KENILWORTH AVE. Date of Inspection: 5-10/11-94
BEAVER HEIGHTS, Md. Date Report Mailed: 9/14/94
20713 Inspector's Name: G. CRITCHLEY
Permit/ID No. _____ Inspector's Office: EPA/AOS

CHECK APPLICABLE

☒ Major _____ Minor
____ Municipal _____ Industrial
____ Federal
____ Joint
____ Oversight
____ Other

Comments: _____

Gerald Critchley
(Inspector)

Media

☐ NPDES
☐ TSCA
☐ RCRA
☐ AIR
☒ Other

FY 89 REGION III ESD
INSPECTION TRACKING SYSTEM

Facility Name: GENERAL AUTO PARTS Type of Inspection: MULTI-MEDIA
(GENERAL)

Address: 1919 KENILWORTH AVE. Date of Inspection: 5-10/11-94
BEAVER HEIGHTS, MI. Date Report Mailed: _____
20743 Inspector's Name: G. CRUTCHLEY

Permit/ID No. _____ Inspector's Office: EPA/AOS

CHECK APPLICABLE

☒ Major ☐ Minor
☐ Municipal ☐ Industrial
☐ Federal
☐ Joint
☐ Oversight
☐ Other

Comments: _____

Gerard Crutchley
(Inspector)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

DATE: June 15, 1995

SUBJECT: Compliance Inspection Report

FROM: Daniel E. Lucero
Environmental Engineer

TO: John J. Ruggero, Chief
Toxics Enforcement Section

PURPOSE: To determine the compliance status of the facility with respect to Title VI of the Clean Air Act (CAA), and specifically Section 608.

ATTENDEES:

Daniel Lucero	U.S. EPA 3AT21	(215) 597-9393
Dawn Banks-Waller	U.S. EPA OECA	(202) 564-7034
Sandy Jones	U.S. EPA OECA	(202) 564-7038
Edgar Johnson	Joseph Smith & Sons	(301) 773-1266
Rodney Wotring	Joseph Smith & Sons	(301) 773-1266

CONTACT: Edgar F. Johnson
Vice President, General Manager

ADDRESS: 2001 Kenilworth Ave.
P.O. Box 64430
Washington, DC 20029

INSPECTION NARRATIVE:

On June 6, 1995, Ms. Banks-Waller, Ms. Jones and I entered the offices of Joseph Smith and Sons, Inc. (JSS). Ms. Banks-Waller, Ms. Jones and I introduced ourselves and presented our credentials to Mr. Edgar Johnson, Vice President and General Manager. I announced our intentions to perform a compliance inspection of the facility. The facility is located at the end of a small road between a residential community and a wooded area on the Maryland and District of Columbia border. The surrounding community could be classified as predominantly minority and economically disadvantaged.

I informed Mr. Johnson that the inspection would be in 3 parts: preinspection interview, tour and post inspection wrap-up. The *Inspector Checklist*, *\$608 Disposal Inspection* and *Appliance Visual Inspection Checklist* were used during this inspection (attached).

Preinspection Interview:

Mr. Johnson answered all of the preinspection questions that

he had knowledge about. I asked Mr. Johnson the questions from the inspection checklist. Mr. Johnson explained that JSS uses a 3 step inspection process to insure no CFCs remain in appliances and MVACs.

The first inspection is performed at the facility gate, located at the entrance to the property. Mr. Johnson stated that company personnel inspect and mark incoming material for unacceptable substances. Mr. Johnson stated that all incoming materials are spray painted with the name or initials of the supplier. (A copy of two JSS unacceptable material lists were provided and are attached.) JSS has several signs posted outside the scale house which notify customers of the company's CFC policy. (A copy of JSS's CFC policy and inspection point was provided and is attached.) The second inspection point is at the scale house. The third inspection point is at the materials unloading area and is conducted by yard unloading personnel. Mr. Johnson stated that once incoming material has passed the yard unloading personnel no more inspections would be performed and the material would be placed in a pile ready for shredding. I asked Mr. Johnson specifically if the yard unloading personnel were the last reasonable inspection point for CFC material and he stated that it was. Mr. Johnson indicated that JSS attempts to process incoming materials within 24 to 36 hours after receipt of the material.

JSS is a member of the Institute of Scrap Recycling Industries (ISRI). ISRI distributes to its members regulatory compliance guides.

TOUR:

Mr. Johnson showed us the gate inspection process. Two company employees were visually inspecting incoming material and spray painting supplier information. Mr. Johnson showed us the company's signs related to CFC material. The scale house was viewed. The materials unloading area was viewed and several incoming vehicles were inspected. No refrigerant systems were found in the motor vehicles inspected. During the unloading area inspection, an MVAC which contained a small appliance was rejected.

I asked Mr. Johnson to direct us to the pile of materials that was ready for shredding. Seven (7) refrigerators were found in the shredder pile and were brought down by a claw from the shredder pile for inspection. A description of each unit is found below. At this point, Mr. Johnson confirmed that the appliances had been through the company's inspection process and were ready for shredding.

- (1) Inspection of a refrigerator showed the refrigerant system to be completely intact. No refrigerant lines were cut, broken or punctured. No visible signs of refrigerant recovery were found. No company mark concerning the supplier was found on the unit. The information from the manufacturing plate was

recorded.

- (2) Inspection of a refrigerator showed the refrigerant system had been removed. No company mark concerning the supplier was found on the unit.
- (3) Inspection of a refrigerator showed the refrigerant system to be broken. No visible signs of refrigerant recovery were found. A bubbling liquid was coming from the broken pipe. The liquid was cool to the touch and felt oily. No company mark concerning refrigerant recovery was found on the unit. The information from the manufacturing plate was recorded.
- (4) Inspection of a refrigerator showed the refrigerant system to be completely intact. No refrigerant lines were cut, broken or punctured. No visible signs of refrigerant recovery were found. No company mark concerning the supplier was found on the unit. No manufacturing plate could be found to record information.
- (5) Inspection of a refrigerator showed the refrigerant system to be completely intact. No refrigerant lines were cut, broken or punctured. No visible signs of refrigerant recovery were found. No company mark concerning the supplier was found on the unit. The information from the manufacturing plate was recorded.
- (6) Inspection of a refrigerator showed the refrigerant system to be completely intact. No refrigerant lines were cut, broken or punctured. No visible signs of refrigerant recovery were found. A company mark concerning the supplier was found and looked like a 3 or a "w". The information from the manufacturing plate was recorded.
- (7) Inspection of a refrigerator showed the refrigerant system and the cooling coils to be broken. No company mark concerning refrigerant recovery was found on the unit.

Many refrigerant containers were in a pile located away from the shredder pile. Mr. Wotring indicated that bottles and cylinders are processed by a contractor. Mr. Wotring stated that the contractor picks up the bottles and cylinders, empties them and returns them ready for shredding.

Mr. Johnson showed me the company's refrigerant recovery equipment. Mr. Johnson stated that JSS does not use the equipment for refrigerant recovery. Mr. Johnson also stated that JSS had attempted for a short time to recover refrigerant, but decided not to continue to recover refrigerant for business reasons.

POST INSPECTION WRAP-UP:

Several of the company's *Indemnity Agreement* forms were viewed in the JSS offices (copies attached). Mr Johnson provided a copy of the purchase invoice for JSS's recovery equipment. The invoiced was dated October 1992. I gave Mr. Johnson the outreach material concerning the section 608 program and the disposal enforcement interpretation from ORE. Mr. Johnson also read and signed my inspection log notes as accurate. I thanked him for his time and cooperation.

Note:

The following safety equipment should be used at this site:

- heavy boots
- safety glasses
- hard hat

cc: D. Banks-Waller (2224A)
S. Jones (2224A)
J. Howell (3RC13)

Inspection Report - Joseph Smith & Sons, Inc. Beaver Heights, MD

Humberto Monsalvo, Environmental Engineer
Clean Air Act Section, 3AT13

David B. McGuigan, Ph.D., Chief
Clean Air Act Section, 3AT13

Address: 2001 Kenilworth Ave.
Beaver Heights, MD
(301) 773-1266

DCRA Facility ID#: ST PERMIT
DCRA Office: Central
Class Code: A1
SCSC ID#:1100100009

Date of Inspection: May 9, 1994

Purpose: To verify the status of compliance with respect to federal and state air pollution control regulations. Particular attention was made to: a) adherence of state operation permits; b) Section 608 subpart (c) (Prohibitions); the Recycling and Emissions Reduction Program, 40 CFR 82.150-82.166, pursuant to §608 of Title VI of the CAAA of 1990; c) and the National Refrigerant Recycle Regulation dated August 19, 1994, 40 CFR §§82.152, 82.154, 82.156, 82.158, 82.161, 82.164, 82.166, pursuant to Section 608 of Title VI of the Clean Air Act Amendments of 1990. The issue of recycle/recover and disposal of chlorofluorocarbons (CFCs) and hydrochlorofluorocarbons (HCFCs) was to be examined and to determine if the source was subject to the above regulations. Also, to observe and ascertain the proper disposal of refrigerant equipment and appliances. Finally, if necessary, to conduct visible emissions readings at the facility, and to observe violations of other environmental regulations.

Attendees:

NAME	AFFILIATION	PHONE #
Humberto Monsalvo	USEPA 3AT13	(215) 597-9393
Gerard Crutchley	USEPA 3ES13	(410) 224-0943
Glen Lapsley	USEPA 3HW33	(215) 597-6684
Marie Holman	USEPA 3WM43	(215) 597-9058
R. Paul Smith	Joseph Smith & Sons	(301) 773-1266
	- President & C.E.O.	
Edgar F. Johnson	Joseph Smith & Sons	(301) 773-1266
	- V.P. Gen Mgr.	
John McGarvey	Joseph Smith & Sons	(301) 773-1266
	- Supervisor	
Rodney A. Wotring	Joseph Smith & Sons	(301) 773-1226
	- Superintendent	

Summary Points:

- 1) In December, 1993 the EPA sent an Information Request Letter for both facilities owned by Joseph Smith & Sons, Inc.: a) General Auto Parts, Inc. (G.A.P.), and b) the Metal Recycling Facility, a.k.a. Joseph Smith & Sons, Inc. (J.S.S.). The questions covered multi-media aspects in all programs. The responses provided yielded suspicion about CFC-related operations such as recycling and proper disposal.
- 2) On March 1, 1994, the EPA received a CFC complaint about the CFC practices at Joseph Smith & Sons, Inc.. In specific, the complainants alleged that the Facility was venting refrigerants into the atmosphere from the improper disposal of refrigeration appliances. It was, also, alleged that the Facility did not have the necessary recycle/recover equipment at the site. Allegedly, the Facility was accepting any appliance with or without refrigerant without proper documentation and disposing such appliances without recovery or recycling of the refrigerants. The complainants contended that several surrounding municipalities were disposing of appliances containing refrigerants R-12 and R-22, as well as, PCBs.
- 3) The on-scene coordinator for the Western Response Center (3HW32), William D. Steuteville, conducted a Spill Prevention Control and Countermeasures (SPCC) inspection of the facility on March 15, 1994. The facility met the minimum requirement to implement an SPCC plan. Oil storage did not have the necessary engineering controls and secondary containment. Overall, the facility was not in compliance with SPCC regulations. Inadequate housekeeping was observed, as well. The facility had two transformers that were suspected to have PCB content; this indicated potential PCB contamination. The disposal of refrigerators and other CFC-containing equipment was observed to be possibly non-compliant with CFC regulations. Due to the variety of waste material at the site, it was suspected that there was soil contamination from lead and other contaminants.

Source Background: NONE

Inspection Narrative:

Surveillance - I arrived at 3:45 P.M. on May 9, 1994 and stayed directly outside of the entrance, on Kenilworth Avenue, to both facilities to observe work activities. I observed normal junkyard activity that included dump trucks hauling automobiles which were to be disposed. There was a side entrance from Kenilworth Avenue that allowed me the opportunity to observe some activity inside a lot that contained a large amount of wrecked automobiles, light trucks, and vans. Dump trucks, vans, and cars that carried varying number of automobiles, light trucks, and vans arrived at the Facility at an approximate rate of four(4) per every ten(10) minutes. These hauling vehicles were of all sizes. A man, believed to be an employee of the Facility and wore a uniform that read, "General Auto Parts Supervisor - Sam," was stationed outside the main entrance in a red pick-up truck with Maryland license plate # 520-540. He had a radio communicator with him and a spray can. I observed him stopping most small dump trucks, with automobiles to be disposed of, and used the spray can to spray certain information on the sides of the disabled automobiles. This person, then had the drivers of the trucks sign some paperwork. When he missed stopping a truck, he used his radio to inform inside personnel of such instances and waited for a response. There was an auto parts store, called General Auto Parts, Inc., next to the Facility. At 5:00 P.M. they noticed me and sent a state trooper to get me away from the premises. The officer's surname was Milleken and approached my car, in a hostile manner, after I called him over. He demanded that I move because the Facility needed to sweep the public area of Kenilworth Avenue where I was stationed. I was under strict orders to wait for the company of an EPA special agent from the Criminal Investigation Division Baltimore Office. The EPA CID agent did not show up. This ended the surveillance period.

Pre-Inspection Interview - I entered the premises of the Facility for a multi-media compliance inspection at 9:30 A.M. on May 10, 1994. EPA Multi-media Team Leader, Gerry Crutchley, directed the pre-inspection meeting in which he introduced the EPA personnel responsible for the different media portions of the inspection. Also present, were respective media personnel from the Maryland Department of the Environment (MDE), and several EPA contractors. Edgar Johnson directed the process description and questions for the Facility. R. Paul Smith responded to the questions about the compliance history of the Facility and corporate issues. Gerry informed the Facility that there was a potential need for sampling for total metals, PCBs, and criteria pollutants.

Plant Tour - Shortly thereafter, the entire group was escorted into the Facility's compounds. The original plan, from Paul Smith, was to keep the EPA and MDE personnel together and tour them around the different sections of the Facility. The reason given for this was for insurance purposes, according to Mr. Smith. (Mr. Smith did not inform us that most the production equipment was going to be shut off.) As the group was escorted to the production compounds, I observed that all of the equipment that had air emissions potential were not operating. Immediately, I conferred with Gerry Crutchley about allowing me to branch off from the group to individually check the equipment. Mr. Crutchley consented to my request and informed me that I could conduct the air inspection separately. As such, I asked Mr. Smith to turn the scrap metal shredder on, as well as, its respective conveyor production line. I requested that all activity for the scrap metal shredder resume to normal levels of operation. Although at first reluctant to do so, Mr. Smith consented to my request and ordered all production equipment to be turned on. Part of this equipment was a wet scrubber that used water as the scrubbing medium. According to Mr. Smith, the water used for the wet scrubber stays in the system. As such, the Facility is a negative user of water and its volume remained in a closed loop of operation; the only waste from the system was steam. Once the operation was restored, I inspected several large scrap piles of appliances that included kitchen stoves, laundry washers, household refrigerators, room air conditioners, driers, and industrial refrigerators/freezers. *From this area, I observed 2 room air conditioners whose refrigerant lines were cut and did not contain a refrigerant charge.* Adjacent to this area, I saw a large "hole" in the ground which, according to Mr. Johnson, was a dry well that had ground water. According to Mr. Johnson, the ground water from this dry well overflowed to a nearby creek. The water was murky and oily-looking. Mr. Johnson informed us that the water had been tested by the County Health Department, but he alleged that results were not provided to the Facility, other than that the water was O.K.. Nonetheless, the dry well water had a musty, foul odor.

Following this area, I moved to inspect the waste byproducts from the metal shredder that were separated via dry magnet rollers into three streams. One stream consisted of steel products that were segregated for steel mills for use in the steel-making. Another stream consisted of non-ferrous material. The third stream consisted of "auto fluff" that was segregated to be landfilled. *Auto fluff was foam or mat-like material recovered from the automobiles, and had to be removed per a state consent order from the Maryland Department of the Environment.* The Facility did not have a compactor for bailing and did not have plans to install another wet scrubber. After observing the shredding operation for several minutes, I saw white smoke emanate from the shredder. After 2 minutes, the smoke got thicker and a burning oil smell developed. I observed numerous

white goods, mostly domestic refrigerators, on the shredding conveyor line. All the material that went into the shredder conveyor line was placed there by means of mechanically-operated cranes. At this point, I was accompanied by the Production Supervisor, Donald Richardson, whose tenure at the company was nine years and seven months at the Supervisor position. I did not observe the material in the shredder conveyor line crushed prior to the shredding process. Such material was segregated into several piles of goods; i.e.- white goods, brown goods, automobiles, etc... Four mechanical cranes picked up crushed and un-crushed cars, from top to bottom, and placed them on the conveyor of the shredder. I observed a shipment of crushed cars that did not have air conditioners from the next-door facility, General Auto Parts, Inc., according to R. Paul Smith. I confirmed this upon inspecting an individual car and did not observe an air conditioner in the engine. Mr. Smith re-iterated to me that *Joseph Smith & Sons, Inc. did not receive any shipment that contained refrigerant; this included automobiles, white goods, and any other type of item to be disposed that required a refrigerant charge.* The next shipment was of uncrushed cars from T & T Disposal facility; at 3803 Old Siler Rd., Washington, D.C., (301) 899-2929, and whose proprietor was Trung Nguyen. The driver of the truck claimed that the cars did not have refrigerants in the air conditioners. I observed the lack of an air compressor in one of the cars and could not confirm the containment of refrigerants in the others. *However, Joseph Smith & Sons did not request nor receive any paperwork that conveyed, in writing, the status of refrigerants in this shipment of cars.*

✓ At this point of the inspection, I was accosted by an angry vendor, Bob Underwood, attempting to dispose of cars. Mr. Underwood was hostile and questioned my presence at Joseph Smith & Sons. I questioned Mr. Underwood about the load on his trailer. He became vulgar and offensive while shouting his opinion about the EPA's CFC regulations on his industry. *He boldly stated that he vented all the refrigerants from his cars prior to arriving at Joseph Smith & Sons.* I did not respond at any time to his rude threatening outburst. Mr. R. Paul Smith attempted to calm Mr. Underwood down and ordered him to leave the premises.

Following this altercation, the next shipment was that of a tractor trailer, from Cobey Co., full of crushed cars. I ordered the mechanical crane to lower selected cars to the ground. Once this was done, I inspected the car and observed a refrigerant charge. Thereafter, I ordered five more cars lowered to the ground. I inspected each car and concluded that each one had a refrigerant charge. I asked Mr. Smith why the Facility received such a shipment and what steps are customarily taken to avoid such an incident. *Mr. Smith confessed that, although, the Facility has a CFC recycle/recovery policy, the Facility did not*

inspect each incoming shipment nor requested a written conveyance from vendors because of time-consuming factors in such an effort. He admitted that the Facility relied solely on the verbal communication of the vendors. Mr. Smith assured me that such an incident was rare and exclusive. Nevertheless, he ordered the tractor trailer driver to return the shipment of cars and requested that future shipments not include refrigerant-charged units. Mr. Smith revealed that the Joseph Smith & Son had rejected the previous shipment from the same vendor due to gasoline in the tanks of the vehicles. At this point, I moved to a nearby pile of refrigerant containers. I noticed four 30-lb. containers of R-22 (Forane brand). The containers were mangled up. Mr. Richardson informed me that these containers were from a construction/demolition job and arrived to the Facility without a refrigerant charge. Mr. Smith concluded that the containers were probably vented into the atmosphere by the demolition contractor.

The area of inspection was the metal shredder. The shredder consisted of a 90,000 lb. shaft that had a 3,000 h.p. motor. The shaft contained 12 steel (14% Mn & Fe) hammers that typically processed about 3,000 tons of metal per month, and operated at 600 r.p.m. which produced an average hammer speed of 150 m.p.h.. The severe safety hazard involved with the shredder was that of flying metal debris emanating from it at a typical speed of 150 m.p.h.. Mr. Smith noted that, in 1993, Joseph Smith & Son attempted to implement a recycle/recover operation for all incoming shipments prior to the shredding operation. The Facility had bought a recycle/recover machine in the Spring of 1993 and used it in the pre-shredding stage for several months until the technicians were unsuccessful in recovering much refrigerant. This was due to the insufficient time allocated to each refrigeration system in order for the efficient refrigerant recovery. Paul Smith eluded to the fact that the Facility had such a recycle/recovery set-up that caused a major bottleneck in the shredding process. As such, Mr. Smith admitted to making a conscious decision in terminating the recycle/recovery process and allow all material to be shredded without physical refrigerant recovery. The Facility's new policy merely consisted of accepting verbal conveyance from vendors that the each incoming shipment did not contain any refrigerant.

I continued walking around the piles of segregated appliances and was accompanied by Donald Richardson. I met Rodney Worting, Mr. Richardson's supervisor, who had been with the Company for 11 years at the time of the inspection. Mr. Worting was the yard Superintendent and reported directly to Mr. Ed Johnson. Mr. Richardson supervised 14 employees of which none were certified to use the recycle/recover equipment. I observed 5 drums of National Refrigerant II (trichlorofluoromethane) whose contents were undetermined. Mr. Smith ensured me that the drums were going to be sent back to their originator. I, also, observed one industrial refrigerator, Model # 316.25 & Serial #

28B86, designed by Duke Manufacturing Co. of St, Louis, MO, to contain 19 ounces of R-12. The refrigerator's lines to the compressor were not cut, nor did it have a "tap" hole to indicate recovery of the refrigerant content, and, thus, its refrigerant volume was alleged to be intact. Mr. Smith assured me that such an appliance would be segregated into a pile to have the recovery contractor evacuate the system. According to Mr. Smith, the recovery contractor was Mr. Jimmy Queen who did who did most of his work for Mr. John McGarvey, Supervisor at General Auto Parts, Inc.. G.A.P. was a sister facility adjacent to Joseph Smith & Son, Inc.. Mr. Smith explained that Mr. McGarvey kept the 2 recycling/recovery machines; one was portable and the other was stationary. The stationary machine was used at G.A.P. strictly to recover the refrigerant content of all incoming automobiles regardless of whether they were to be used for parts or to be disposed of. Per Mr. Smith, Mr. Queen worked only on a contract basis and was not a full-time employee of J.S.S.. I informed Mr. Smith that I needed to interview Mr. Queen with regard to all the refrigerant recovery work done.

Upon returning from lunch, the multi-media team met with Mr. Smith and his senior management. Mr. Crutchley provided Mr. Smith with a couple of EPA forms to sign; one was the enforcement confidentiality form and the other was, a sampling chain of custody form. The team broke up into smaller groups to inspect individual areas throughout J.S.S. and G.A.P.. I joined the group that headed to G.A.P.. Mr. Smith revealed that he bought G.A.P.'s stock three and a half years prior to the inspection, and was the majority stockholder. Previously, G.A.P. consisted of 5 different automotive wreckers that leased the facility from the landowner. G.A.P. recovered usable parts from automobiles usually no older than 8 years. Mr. Smith noted that it was customary for G.A.P and J.S.S. to mutually exchange services.

At G.A.P, I was accompanied by Mr. McGarvey whose overall tenure was 24 years, between J.S.S. & G.A.P.; only the last 6 months were as Supervisor of G.A.P., which employed 20 persons. Paul Thorp was the Assistant Manager at G.A.P. and reported to Mr. McGarvey. Near the entrance of the Facility, a large sign indicated the Company's policy on refrigerant recovery and recycling. The sign read as follows: "all cars sold to GAP must have the CFCs(freon) removed from the air-conditioning system. G.A.P. will remove the CFCs for a charge of \$5.00 per car." Adjacent to the entrance scale, that was used to weigh all incoming cars, I observed an open-top tank used to collect the gasoline from all incoming cars. The tank was approximately 4 ft. x 4 ft. x 5 ft. and it took about a week and one day to fill its 250 gallon volume, according to Mr. McGarvey. The tank remained uncovered at all times. When full, the tank's volume was poured into an above-ground storage tank located in the back of the Facility. I detected strong gasoline odors emanating from the open-top collection tank. Cars, whose parts were removed or

were not sellable and whose refrigerant content had been recovered, were brought to J.S.S. for shredding. The shredder at J.S.S. was operated approximately 14 hours per day and for five days per week, according to Mr. Smith. G.A.P. received about 50 cars per day; 5% of which were missing motors. Mr. McGarvey explained that G.A.P. had attempted, for the last 12 months prior to the inspection, to recover and/or recycle the air conditioning systems of incoming cars. However, he explained that the Company did not have an area designated for dismantling air conditioning systems. Mr. McGarvey re-iterated that Mr. Queen was the only person authorized by J.S.S. and G.A.P. to use the 2 recovery/recycling machines. The last time Mr. Queen performed any refrigerant recovery or recycling was the Saturday prior to May 10, 1994; at which time he performed such work on 10 cars. While inspecting the back portion of the Facility, I observed 7 tanks without lids, but had funnels and troughs. Mr. McGarvey indicated that they were future gasoline transfer tanks. Upon returning to G.A.P.'s office, I was shown one of the 2 recycling/recovery machines owned by J.S.S.. The stationary machine was from Global Ozone Solutions in New Hampshire; whose telephone number was (603) 880-8365. The unit's name was Easy Recovery System with Model # ERS-202 and Serial # 03249. It had a connection hook-up to the automotive air conditioning system and had one recovery tank with 60 lb. maximum capacity. Mr. McGarvey explained that the machine was typically turned on and the recovery tank was placed on a scale; the machine would shut off by itself. **After explaining a typical run with the unit, Mr. McGarvey stated that, "I know we're in violation, but we're trying to do everything better and right."**

Following the inspection of the recovery/recycling machine, I inspected the production yard. **I inspected about 70 cars of which 60 had air conditioning systems intact. Thus, it is presumed that each of these air conditioning systems had refrigerant content.** According to Mr. McGarvey, G.A.P. was trying to inspect more cars for refrigerant content in air conditioning systems before engines were dismantled and sent to J.S.S. for shredding. **As a result of this observation, it was suspected that cars were crushed with their air conditioning systems intact causing CFCs to be vented to the atmosphere.** This concluded the inspection of G.A.P..

Post-Inspection Interview - The following day, the EPA team returned to J.S.S. and G.A.P. to complete the inspection. The organizational chart was re-iterated as follows: Mr. Ed Johnson reported to Mr. Smith; Mr. McGarvey reported to Mr. Johnson; Mr. Steve Hawkins was assistant supervisor at G.A.P. and reported to Mr. McGarvey; Mr. Johnson had only been in charge of G.A.P. since January, 1993; and Mr. Paul Thorp was in charge of the retail sale aspect of the business and reported to Mr. Johnson. I provided Mr. Johnson with a list of records and documentation I needed to determine compliance. The list read as follows:

- 1) "Provide copies of invoices on a weekly or monthly basis for all loads received from vendors for the last 12 months.
- 2) For the last 12 months, provide the percentage of tonnage per month from cars, from refrigerators, window air conditioners, and other CFC-containing scrap.
- 3) Provide a copy of the original purchase invoices of the 2 recycling/recover machines which are used to recover CFCs. The purchase invoices should indicate the following information: date of purchase; vendor name, address, and telephone number; the description of the unit including model and serial number; and the price of the units.
- 4) Provide any verification that is kept by the Company to acknowledge receipt of scrap from which refrigerant has been removed. (If available).
- 5) For the date of May 10, 1994 and the time spent with Paul Smith alongside the shredder and its scrap pile, provide the names and addresses with telephone numbers of the 3 or 4 loads that were rejected prior to shredding.
- 6) For rejected loads, does the company normally document such incidents?
- 7)
 - a) Please submit all work or service invoices provided to Joseph Smith & Sons as a result of a work contract with Bob Underwood.
 - b) Please provide Bob Underwood's address, telephone number, and a copy of the work contract with Joseph Smith & Sons, Inc..
- 8)
 - a) Please submit all work invoices for services provided to your company as a result of a work contract with Jim Queen. These invoices should indicate the date of service, tonnages, type of scrap (cars, window A/Cs, refrigerators, etc...), and service fee paid.
 - b) James Queen's address (business or private), telephone number, and copy of service contract with your Company.

- DOCUMENTATION REQUIRED FROM G.A.P. -

- 1) Provide technician certification for use of recycle/recover machines. This should indicate date of certification, education, educational entity name, description of training, recipient name, and a certificate number.

2) Provide the recycle/recover equipment certification forms for both recycle/recover machines used. These forms should consist of the EPA form for equipment certification.

3) Describe the type of documentation that is kept to record the service done by using the recycle/recover machine. This should indicate the date of service, type of equipment serviced, amount of refrigerant recovered, and location of service provided.

4) Provide the name of the other entity that you provide refrigeration recycle/recover services through a work contract. It should also indicate: address, telephone number, and dates. Also, a copy of the contract is necessary."

I asked Mr. Johnson to explain how the J.S.S. and G.A.P., particularly J.S.S., segregated or identified each type of incoming good. Accordingly, he described the following identification system which is supposed to be reflected in their invoices. The terms sheet iron, tin, or sheet were terms that identified incoming sheet metal(carbon steel). Steel #2 indicated incoming automotive rear ends, axles, and heavier pieces. Tanks referred to hot water heaters, fuel tanks with holes on one end. The terms flats meant crushed cars. Trucks referred to crushed or uncrushed trucks, and buses indicated crushed or uncrushed school buses. Almost all thin-gauged metal goods, such as tin, sheet iron, and sheet went directly to the shredder. *White goods, such as household refrigeration and air conditioning appliances, were not segregated. According to Company policy, such appliances had to go through the recovery/recycling process before going to the shredder.* Upon my request, Mr. Johnson described the following variety of products from J.S.S.: 1) plate and structural steel, mostly derived from #2 steel; 2) shredded scrap of quality ferrous grade; 3) unshredded non-ferrous scrap (2 grades of Cu and 3 grades of Al); 4) ivory die cast which was metal that contained Pb and Zn and comprised the primary non-ferrous recovery product from the shredder; 5) shear which was heavy steel scrap; and 6) any other non-ferrous material. *J.S.S. had a strict policy of not accepting 55-gallon drums for safety and environmental reasons.*

The EPA team disbanded to different areas throughout J.S.S. and G.A.P.. I continued my inspection of G.A.P. and interviewed Mr. James (Jimmy) C. Queen. Mr. Queen explained that he worked for J.S.S. and G.A.P. as a refrigerant recovery/recycling contractor and had been associated with J.S.S. for 24 years. He described himself as self-employed businessman in the automotive removal business and owned one tow truck (a 2-car carrier). The recycle/recovery business was started several years, prior to the inspection, at the request of J.S.S.. Mr. Queen informed that his work contract with J.S.S. was a verbal agreement. He

explained that in addition to his contract, J.S.S. had work contracts with other disposal facilities to recover refrigerant from disposed appliances at local landfills. Such landfills included the Millersville Landfill and the Sutley Road Landfill, both in Calvert County. At Millersville, Mr. Queen averaged 22 units per weeks. Such work at the landfills was begun in 1993 with the use of a recycle/recover machine transported in his truck. J.S.S. owns both recycle/recovery machines which can be perform refrigerant recycling and recovery at landfills only twice per week. Also, he was not involved with field inspection procedures to check for refrigerant content of incoming cars at G.A.P.. As of May 10, 1994, J.S.S. obtained a new contract with the city of Laurel, MD. The work for the city of Laurel was done in an open area site adjacent to a solid waste disposal facility. The work was specific to household refrigerators with R-22 refrigerant content; automobiles generally contained refrigerant R-12. Mr. Queen re-iterated that refrigerant recycling/recovery on automobiles was strictly done at G.A.P.. Up to the date of the inspection, Mr. Queen had recovered a total of 150 pounds of R-22 which he kept in his house garage in two 30-lb bottles and one 90-lb bottle. The 150 pounds of R-22 was recovered refrigerant from all the work done at the 2 landfills, and the work performed for the city of Laurel. A 50-lb bottle was kept at the office of G.A.P. for recovering R-12. All of the refrigerant recovered was property of J.S.S. for future disposition. According to Mr. Queen, a typical refrigerator yielded 2.5 - 3.5 pounds of R-22 and a window air conditioner yielded 4.5 - 6.0 pounds of R-22 depending on size of the unit. Likewise, a typical motor vehicle air conditioner yielded 3.5 - 4.0 pounds of R-12 depending on the size of the car. Mr. Queen performed refrigerant recycling/recovery on the average of 65 units per day, by himself, and an average of 100 units per day with an assistant. Mr. Queen did not know about the technician certification requirement and assured me that he was going to call EPA Region 3 CFC Program Coordinator, Daniel E. Lucero to attain his technician certification immediately. As such, he intended to stop all refrigerant recycling/recovery momentarily until he was formally certified. Similarly, Mr. Queen did not know about the equipment certification requirement and stated that J.S.S. never filled out an equipment certification form. After evacuating an appliance, Mr. Queen spray-painted the phrase, "no refrigerants" along with the date of recovery; this was Paul Smith's idea. The scale that was used at G.A.P. was strictly used for R-12 recycling/recovery work and had never been calibrated. Mr. Queen never used a scale in his R-22 refrigerant recycling/recovery work at landfills or elsewhere; the holding bottles for the R-22 refrigerant recovery/recycling work had floats as volume indicators. I inspected the floor scale, kept in the G.A.P. office, used strictly for R-12. The manufacturer was Pelouze and its model # was P250, with a 250-pound capacity.

The following information pertained to the R-22 recycle/recovery machine Mr. Queen used and kept in his truck for refrigerant work at landfills: manufacturer, Global Ozone Solutions located in Nashua, N.H. 03060 at telephone number (603) 880-8365; model #, ERS-202, Easy Recovery System; serial # 03413493 with an air conditioner unit pressure gauge; and special feature was a tank hook-up with warning lights to indicate full tank volume. The tank used for this machine was a 50-lb bottle; Mr. Queen had 2 other 50-lb bottles. Mr. Queen did not document the refrigerant recycling/recovery work he performed at G.A.P. on cars or at J.S.S.. This ended my interview with Mr. Queen. Furthermore, Mr. John McGarvey informed me that the floor scale used for R-12 in the G.A.P. office was certified once per year by All Way Calibrators, Inc.. The calibration was done only when there was problem with the scale. In conclusion, Mr. McGarvey revealed that on May 11, 1994, G.A.P. accepted a total of 37 cars and rejected approximately 10 cars that had intact air conditioning systems. This concluded the inspection of J.S.S. and G.A.P..

cc: D. Lueckenoff 3DA00
J. Howell 3RC13
D. Lucero 3AT12
J. Hagedorn 3AT13

B. Harris 3AT13
G. Crutchley 3ES13

RCRA Compliance Evaluation Inspection

Notification
form 1

Joseph Smith & Sons, Inc.
2001 Kenilworth Avenue
Capitol Heights, Maryland 20743

Commented
on: 2/15/96

(301) 773-1266

General Auto Parts
1919 Kenilworth Avenue
Capitol Heights, Maryland 20743

(301) 773-8900

Date of Inspection: June 29-30, 1995

EPA Representatives:

Gerard W. Crutchley
Environmental Protection
Specialist

Diane Schott
Region III
Hazardous Waste Division

Md. State Representative:

Hilary Miller
MDE/WAS Central Md.
Regional Manager

Facility Representatives:

Edgar Johnson
General Manager
Joseph Smith & Sons, Inc.

Paul Tharp
General Auto Parts

John McGarvey
General Auto Parts

Background

EPA Region III's Annapolis Operations Section received a request from Region III's Hazardous Waste Division to conduct a RCRA Compliance Evaluation Inspection at Joseph Smith & Sons, Inc. and General Auto Parts, both located in Capital Heights, Maryland. The EPA inspector (Gerard Crutchley) was accompanied by Diane Schott from EPA Region III's Hazardous Waste Division and Hilary Miller from the Maryland Department of the Environment.

Inspection Observations

At the beginning of the inspection, the facility representative for Joseph Smith & Sons (Ed Johnson) described some of the activities which had taken place since the multi-media inspection was conducted in May of 1994. Some of the projects which have been completed are the construction of a barrier between the facility and the Amtrak rail line just north of the facility. Mr. Johnson also stated that they have completed the placement of the barrier between the facility and Beaver Dam Creek. This barrier extends along the south side of the facility from the plant entrance to a point just east of the shredder operation. According to Mr. Johnson, the facility has also been involved in the removal and processing of some of the old material (fluff and scrap metal) which had been stockpiled throughout the facility. Mr. Johnson estimates that they have removed approximately 60% of the old material from the site and their goal is to end up with a virtually flat facility with only recently received materials for processing.

The EPA and State representatives accompanied by facility personnel toured the entire facility to observe the facility's operations. Along the south side of the facility the EPA and State inspectors observed the barrier which had been placed between the facility and Beaver Dam Creek (See Photo No. 1). Also along the south side of the facility just to the east of the shredder unit, the EPA and State representatives observed the area where the excavated pit (dry well) and large piles of scrap had been observed during the May, 1994 multi-media inspection. At the time of this inspection, the EPA and State representatives observed a large concrete pad and retaining wall which had been constructed in this area to hold fluff material generated by the shredder operation (See Photo Nos. 2 & 3). The pit observed during the 1994 inspection had apparently been filled in and the large piles of scrap had been removed and, according to facility personnel, processed through the shredder unit.

The next area observed by the EPA and State inspectors was the shearing unit located at the east end of the facility. According to Mr. Johnson, the shearing unit is no longer in use and the facility plans to sell all of the equipment associated with the unit. Mr. Johnson stated that the facility now uses two crane operated shears for cutting up large pieces of metal.

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On the north side of the concrete pad described previously in this report, the EPA and State representatives observed an area that had previously (May, 1994) contained large piles of metal generated by the shredding unit. Since the May, 1994 inspection, most of the metal had been removed from the site (See Photo No. 4).

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The EPA and State inspectors did observe the facility's stormwater retention basin (See Photo No. 6). Mr. Johnson stated that they still have plans to reuse the water collected in the basin as make-up water for the shredder unit. Mr. Johnson also said that they were trying to develop some method for pumping this water over to the shredder unit.

Just east of the facility's main building, the inspectors observed an old paper bailing unit (See Photo No. 7). It appeared that the unit is no longer operational and this was confirmed by facility personnel. The EPA inspector observed what appeared to be dark colored water pooled on the ground all around the unit (See Photo No. 8). When questioned about the water, facility personnel responded that they were not sure what it was.

In the facility's main building is a large warehouse area which serves as the maintenance shop and the non-ferrous metals operation area. In the maintenance shop, the EPA and State inspectors observed two fifty five gallon metal drums (See Photo No. 5). One of the drums was marked with the word "capacitors" and was empty. The other drum was not marked, but it contained a small amount of material which Mr. Johnson said was oil contaminated soil. Mr. Johnson said that if they spill any oil, they use absorbent to soak up the oil and place the oil soaked absorbent and any contaminated soil in a drum. When the drums are filled they are shipped off-site for disposal.

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According to Mr. Johnson, several drums of material had been shipped off site on June 28, 1995 (one day prior to the subject inspection). The EPA inspector obtained copies of the shipment manifests and associated paperwork from the facility representatives (See Attachment Nos. 1 & 2). The manifests indicate that the facility shipped five drums of small PCB capacitors (removed from appliances) and four drums of oil contaminated soil. The manifest for the PCB capacitors contained an out of service date for the capacitors as well as a unique number for each drum. The manifest for the soil indicated that it was shipped as a hazardous waste (D007 & D008). A waste profile and a land disposal restriction notification form were also attached to the shipment manifest. Mr. Johnson said that they have never sampled and analyzed this material, but their disposal contractor told them it should be classified as hazardous waste. Mr. Johnson stated that they request a one time generator identification number from the State of Maryland each time they need to ship waste off-site.

The EPA inspector informed the facility personnel that if

they were classifying the oil contaminated soil as hazardous waste then they would need to properly label and date any drums in which the material was accumulated.

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During the subject inspection, the EPA inspector collected samples from two locations at the facility. Sample No. JSS-1 consisted of water from the south end of the facility's stormwater retention pond. The sample was analyzed for the following RCRA characteristics: Ignitability, Reactivity, and TCLP. A field pH measurement indicated that the pH of the subject sample was 7.70.

A second sample (JSS-2) was collected from the standing water around the old paper bailing unit. This sample was also analyzed for Ignitability, Reactivity, and TCLP. A field pH measurement of this sample indicated that the pH of the sample was 7.65.

Both of these samples were returned to the EPA lab in Annapolis for analysis. The analytical results indicated that neither of the two samples exhibited any of the RCRA characteristics. A copy of the analytical results are attached to this report (See Attachment No. 3).

During the subject inspection, the EPA inspector also conducted a general tour of the General Auto Parts facility and spoke with facility personnel about the operations at that facility. Operations at this facility have not changed since the EPA multi-media inspection conducted in May of 1994 and it appears that General Auto Parts does not generate any hazardous waste materials.

not an inspection?

→ Please tell me if they don't.

Summary of Findings

On June 29 & 30, 1995, a representative from EPA Region III's Annapolis Operations Section conducted a RCRA Compliance Evaluation Inspection at Joseph Smith & Sons, Inc. and General Auto Parts both of which are located in Capitol Heights, Maryland. Listed below are the findings from this inspection:

1. During the subject inspection, the EPA representative observed two drums in the facility's maintenance shop. One was marked with the word capacitors and was empty, the other drum contained a small amount of oil contaminated soil but there were no markings on this drum. These drums, when filled, are shipped off-site as hazardous waste. The EPA representative told facility personnel that if they were classifying this material as hazardous waste then they would be required to mark and date the drums.

And keep them for 90 days

The facility has never notified EPA or the State of Maryland regarding any ongoing RCRA activities at the facility. The EPA inspector told facility personnel that they might be classified as a small quantity generator and subject to the regulations covering the generation of small quantities of hazardous waste. The inspector reviewed the regulations with facility personnel and subsequent to the inspection provided the facility with a copy of the EPA inspection checklist for small quantity generators.